

1 KATHLEEN BLISS, ESQ. (NV Bar #7606)  
2 Email: kb@kathleenblisslaw.com  
3 **KATHLEEN BLISS LAW, PLLC**  
4 1070 West Horizon Ridge Parkway, Suite 202  
5 Henderson, Nevada 89012  
6 Tele: (702) 463-9074

7 **-and-**

8 PAUL S. PADDA, ESQ. (NV Bar #10417)  
9 Email: psp@paulpaddalaw.com  
10 DAVID J. STANDER, ESQ. (*Admitted PHV*)  
11 Email: dstanderlaw@gmail.com  
12 **PAUL PADDA LAW, PLLC**  
13 4560 South Decatur Blvd., Suite 300  
14 Las Vegas, Nevada 89103  
15 Tele: (702) 366-1888

16 **-and-**

17 DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)  
18 Email: dmitchell@jenner.com  
19 **JENNER & BLOCK, LLP**  
20 1099 New York Avenue, N.W., Suite 900  
21 Washington, D.C. 20001-4412  
22 Tele: (202) 639-6090

23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE  
27 MEMORIAL HOSPITAL, INC. (doing  
28 business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
CHRISTIE EL-MELIGI AND  
NETRISHA DALGAI’S TIME TO  
RESPOND TO MOTION TO  
TRANSFER VENUE  
(FIRST REQUEST)**

1 Pursuant to Federal Rule of Civil Procedure ("FRCP") 6 and the Court's Local Rule of  
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Christi  
3 El-Meligi and Netrishia Dalgai (Third Party Defendants) additional time, to and until March 10,  
4 2023 to respond to Defendants' motion to transfer venue (ECF No. 245) to the District of  
5 Arizona. Currently, a response to the pending motion is due on February 24, 2023.

6 Good cause exists to support this request. Undersigned counsel for Mss. El-Meligi and  
7 Dalgai have notified counsel for Defendants that their clients are in the process of retaining new  
8 counsel and that they will need additional time to respond to the pending motion.

9 Counsel for the respective parties have communicated regarding this Stipulation and  
10 agree that an extension of time of two additional weeks, to and until March 10, 2023, to  
11 respond to the pending motion to transfer is appropriate under the circumstances.

12 The parties respectfully request the Court approve this Stipulation.

13  
14 /s/ Kris Leonhardt

/s/ Paul S. Padda

15 \_\_\_\_\_  
16 Pavneet S. Uppal, Esq.  
17 Kris Leonhardt, Esq.  
18 Jeffrey D. Winchester, Esq  
19 *Counsel for all named Defendants*

\_\_\_\_\_  
Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff,  
Counterdefendant and Third-Party  
Defendants*

20 Dated: February 23, 2023

Dated: February 23, 2023

21  
22 **IT IS SO ORDERED:**

23  
24   
25 **UNITED STATES MAGISTRATE JUDGE**

26 **DATED: February 24, 2023**  
27  
28